claims.

The Examiner has stated that figures 7 and 8 of Focsaneanu disclose "a routing query signal ... specifying said destination to which said information will be routed." However, Applicants believe that Focsaneanu instead discloses a query signal that determines which network will be used.

Applicants submit that Focsaneanu explains this query to be a "service request" that may be for either "POTS service" or a "data service." If the choice is data, it must be determined, by consulting the customer profile of the database, which data service is desired (see Focsaneanu, column 9, lines 30-35). Focsaneanu further discloses that this query may take the form of a DTMF signal. Focsaneanu explains that "a request for a data connection is preceded by a '1' DTMF signal" and "a request for a voice (POTS) connection is preceded by a '0' DTMF signal." (see column 13, lines 22-31)

On the other hand, the claimed invention discloses "receiving a routing query signal ... specifying said destination to which info will be routed." Page 2 of the disclosure explains that the routing query signal "specif[ies] the destination to which the information will be routed." The Applicants do not believe that Focsaneanu discloses this feature, as the query signal recited by Focsaneanu does not specify a destination to which information should be routed. It is the Applicants' belief that specifying a thoroughfare for a communication (e.g., POTS vs. data) is very different than specifying the recipient of that communication.

According to the examiner, figures 7 and 8 of Focsaneanu also describe "a memory (248) for storing ... at least one characteristic of said destination." However, while Focsaneanu discloses the memory of figure 8 as storing a customer profile, an address conversion table, a protocol conversion table, a routing table, and a service provider profile,

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Applicants believe that Focsaneanu does not disclose the memory as storing a characteristic of the destination.

Firstly, the customer profile is not a characteristic of the destination. Instead, Applicants submit that Focsaneanu (column 8, line 28) discloses the customer profile as containing information about what data services are subscribed to by the user initiating the connection. As explained above, this profile is used to determine which data service to use when the initiating user selects a data connection instead of POTS. However, no characteristics of the destination that will be reached via this connection are disclosed as being part of the customer profile.

Secondly, the service provider profile is not a characteristic of the destination. Service providers are disclosed (see Focsaneanu column 5, line 31) to be entities like "PSTN providers, data switched network providers, data network access service providers, database service providers, wireless access providers, CATV service providers, etc." Thus a service provider profile contains characteristics of the networks and network providers, not characteristics of a destination that would be reached via these networks.

Thirdly, the protocol conversion table is not a characteristic of the destination. Instead, Focsaneanu (column 13, line 50) discloses the protocol conversion table as containing information that is used "where protocol conversions are required."

Lastly, neither the routing table nor the address conversion table is a characteristic of the destination. Instead, column 13, lines 56-70 of Focsaneanu note these tables as being used for tasks such as "translation of an internet address to a packet data address."

On the other hand, the claimed invention discloses a "memory storing at least one characteristic of [the] destination." The Applicants direct the Examiner to page 2 of the

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disclosure which describes the memory as storing "at least one characteristic of the destination."

The Applicants do not believe that Focsaneanu discloses this feature, as Focsaneanu does not

disclose the memory as storing a characteristic of the destination.

Based on the above comments, it is the Applicants' belief that Focsaneanu

does not disclose claims 1, 2, 6-9 and 11-18, and that these claims are therefore allowable

over such reference.

III.    Rejections under 35 U.S.C. § 103

The examiner has rejected claims 3-5, 10 and 19 under 35 U.S.C. 103(a) as being

unpatentable over Focsaneanu in view of what is presently known in the art.

Concerning claims 3, 4, 10 and 19, the examiner argues that Focsaneanu

"disclose[s] a system and method as discussed in claims 1, 9 and 13 above," and that although

Focsaneanu "fail[s] to teach that said destination and said source subscribe to a same fixed

wireless service network," that "it would have been obvious to one skilled in the art ... to replace

the wired service network of Focsaneanu."

However, as shown above Focsaneanu fails to disclose, teach, or suggest the

system and method of claims 1, 9 and 13.  Firstly, Focsaneanu fails to disclose, teach or suggest

a routing query signal specifying the destination to which information will be routed.  Secondly,

Focsaneanu  fails to disclose, teach, or suggest a memory for storing at least one characteristic of

the destination.

Accordingly, claims 3, 4, 10 and 19 would not be obvious in light of Focsaneanu.

Moreover, because claim 5 depends from claim 3, it is also believed to be allowable over
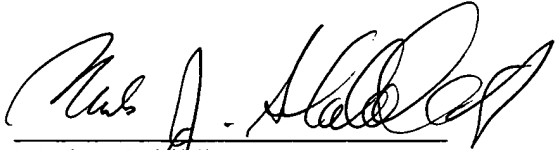
Focsaneanu.

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## IV.    Request for Reconsideration

Applicants respectfully submit that the claims of this application are in condition for allowance. Accordingly, reconsideration of the rejection and allowance is requested. If a conference would assist in placing this application in better condition for allowance, the undersigned would appreciate a telephone call at the number indicated.

## VI.    Authorization

The Commissioner is hereby authorized to charge any additional fees which may be required for this amendment, or credit any overpayment Deposit Account No. 13-4500, Order No. 2455-4490.

Respectfully submitted,
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